

Mr. David Keith
Project Coordinator
Anchor QEA, LLC
614 Magnolia Avenue
Ocean Springs, MS 39654

RE: Draft Addendum 3 Groundwater Study Sampling and Analysis Plan
San Jacinto River Waste Pits Superfund Site, Harris County, Texas
Unilateral Administrative Order, CERCLA Docket No. 06-03-10

Dear Mr. Keith:

The Environmental Protection Agency (EPA) and other agencies have performed reviews of the above referenced document dated November 2015. The enclosed comments shall be incorporated in the Final SAP and copies provided for approval within 30 days of receipt of this letter.

If you have any questions, please contact me at (214) 665-8318, or send an e-mail message to miller.garyg@epa.gov.

Sincerely yours,

Gary Miller
Remediation Project Manager

Enclosure

cc: Satya Dwivedula (TCEQ)
Bob Allen (Harris County)
Linda Henry (Port of Houston Authority)
Angela Sunley (Natural Resource Damage Assessment Trustee Program, TGLO)

Comments

Draft Addendum 3 Groundwater Study Sampling and Analysis Plan (SAP)

1. (Section 2.2, p. 6): The purpose stated in the SAP regarding sampling the waters near the southern impoundment is to determine if there is a dioxin/furan release from shallow groundwater to surface and deep groundwater. However, the plan only mentions sampling of the shallow groundwater, not of the deep groundwater. The SAP shall confirm that deep groundwater sampling is also included in the sampling plan/event.
2. (Section 2.3 & 2.4, p. 7 & 8): The SAP states that the data will be compared to the state surface water quality criteria, Maximum Contaminant Levels (MCLs), and state drinking water quality criteria. The data shall also be compared to historical data obtained from these monitoring wells during past sampling events as well as the Texas Commission on Environmental Quality (TCEQ) Texas Risk Reduction Program (TRRP) groundwater values.
3. (Section 2.3, p. 7): Depending on the limitations of the available SPME (solid-phase micro extraction) technology, the PRPs shall ensure that the proposed approach is capable of detecting groundwater concentrations at or below the Texas Surface Water Quality Standard (i.e., 7.97×10^{-8} ug/L (or 0.0797 pg/L) 2,3,7,8-tetra-chloro-dibenzo-p-dioxin (TCDD) equivalent).
4. (Section 2.4, p. 8 & 9): The laboratory methodology shall be included, and shall specify how calibration standards are to be produced and how SPME partition coefficients are to be determined, along with quality assurance/ quality control procedures specific to this method.
5. (Section 3.2.3, p. 14): The SAP proposes abandonment of groundwater monitoring wells following data reporting and EPA approval. It would be beneficial to keep the groundwater monitoring wells and establish a long-term groundwater monitoring program to ensure non-migration of COCs into the groundwater over time. The wells shall be retained until further notice.
6. (Section 3.3.3, p. 16): For the area north of I-10, the SAP proposes installation of two groundwater monitoring wells (SJMWO11 and SJMW013) at a 45 degree angle from vertical. The SAP shall clarify how annular materials (filter pack, bentonite slurry, etc.) on an angular slope are installed such that they are placed at desired intervals and are evenly distributed around the well casing.
7. (Section 3.3.5.2, p. 19): The SAP discusses the use of a proportionality constant to estimate the concentration of each chemical in the groundwater. The SAP shall provide information to demonstrate, or perform actions to verify (using either field or lab testing) that the proportionality constant is appropriate for the chemical and physical conditions at the San Jacinto River Waste Pits Site.